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Case:

1 KELLER BENVENUTTI KIM LLP TOBIAS S. KELLER (Cal. Bar No. 151445) 2 (tkeller@kbkllp.com) DAVID A. TAYLOR (Cal. Bar No. 247433) 3 (dtaylor@kbkllp.com) THOMAS B. RUPP (Cal. Bar No. 278041) 4 (trupp@kbkllp.com) 101 Montgomery Street, Suite 1950 5 San Francisco, California 94104 Telephone: (415) 496-6723 6 Facsimile: (650) 636-9251 7 Attorneys for the Debtors and Debtors in Possession 8 9

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF CALIFORNIA SANTA ROSA DIVISION

In re:

LEFEVER MATTSON, a California corporation, *et al.*,

Debtors.

Lead Case No. 24-10545 (CN)

(Jointly Administered)

Chapter 11

In re:

KS MATTSON PARTNERS, LP,

Debtor.

DECLARATION OF EURIC RAMIREZ IN SUPPORT OF ADEQUATE ASSURANCE OF FUTURE PERFORMANCE WITH RESPECT TO THE ASSUMPTION AND ASSIGNMENT OF EXECUTORY LEASES AND/OR UNEXPIRED CONTRACTS IN CONNECTION WITH THE SALE OF 501 CARPENTER STREET, FAIRFIELD, CA 94533

[No Hearing Requested]

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The last four digits of LeFever Mattson's tax identification number are 7537. The last four digits of the tax identification number for KS Mattson Partners, LP ("KSMP") are 5060. KSMP's address for service is c/o Stapleton Group, 514 Via de la Valle, Solana Beach, CA 92075. The address for service on LeFever Mattson and all other Debtors is 6359 Auburn Blvd., Suite B, Citrus Heights, CA 9562. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://veritaglobal.net/LM.

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Case:

- I, Euric Ramirez, declare as follows, pursuant to 28 U.S.C. § 1746:
- I submit this declaration (the "Declaration") with respect to the assumption and assignment of executory leases and/or unexpired contracts (the "Agreements") in connection with the sale of the real property located at 501-523 Carpenter Street, Fairfield, California 94533 (the "Subject Property"), commonly known as the Marpel Apartments, from the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") pursuant to the Purchase and Sale Agreement dated June 9, 2025 (the "Purchase Agreement") attached as Exhibit A to Exhibit 1 to the Notice of Sale of 501 Carpenter Street, Fairfield, CA 94533, filed concurrently herewith.
- 2. Except as otherwise indicated herein, the facts set forth in this Declaration are based upon my personal knowledge, my review of relevant documents, information provided to me, or my opinion based upon experience, knowledge, and information concerning my finances. If called upon to testify, I would testify to the facts set forth in this Declaration.
 - 3. I am the purchaser of the Subject Property.
- 4. I am an experienced multifamily owner and operator who currently owns multiple multifamily assets, including several in Solano County. I am experienced in management, operations, and repair and capital improvement projects. My residence is located close to the Subject Property.
- 5. I have the experience, financial resources, stability, and cash flow from other properties and employment to successfully manage and run the Subject Property and to assume the Agreements. I have no excessive debt and have positive monthly cash flow from my investments.
- I have reviewed the financial information for the Subject Property provided by the 6. Debtors, and I am capable of meeting the financial obligations of the Agreements.
- 7. I am willing and able to perform my obligations under the Purchase Agreement and the assigned Agreements.

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KELLER BENVENUTTI KIM LLP 101 MONTGOMERY STREET, SUITE 1950 SAN FRANCISCO, CALIFORNIA 94104 I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 7/30/2025

Euric Ramirez

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